

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

DR. BRENDA HENRY-OFFOR and  
DR. MARIE CHANTAL DAMAS,

Plaintiffs,

-against-

THE CITY UNIVERSITY OF NEW  
YORK, CUNY GRADUATE CENTER, and  
DONALD ROBOTHAM,

Defendants.

-----X

**NOTICE OF DEFENDANTS' PARTIAL  
MOTION TO DISMISS**

11 Civ. 4695 (NRB)

ECF

**PLEASE TAKE NOTICE** that, upon the Complaint, dated July 7, 2011, the accompanying Memorandum of Law in Support of Defendants' Motion for Partial Dismissal, dated November 17, 2011, and all prior pleadings and proceedings herein, Defendants City University of New York, and Dr. Donald Robotham, by their attorney, ERIC T.

SCHNEIDERMAN, Attorney General of the State of New York, will move this Court before the Honorable Naomi Reice Buchwald, United States District Judge, at the United States District Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, for an order dismissing the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) together with such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Parties agreed upon briefing schedule, answering papers are to be served and filed on or before December 12, 2011, and reply papers, if any, are to be served and filed on or before December 19, 2011.

Dated: New York, New York  
November 17, 2011

Respectfully submitted,

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York  
Attorney for Defendants  
By:

/S  
CHRISTINE A. RYAN  
Assistant Attorney General  
120 Broadway, 24th Floor  
New York, New York 10271  
Tel.: (212) 416-8652

By ECF  
Walker G. Harman, Jr.  
The Harman Firm, PC  
*Counsel for Plaintiffs*  
200 West 57<sup>th</sup> St., Suite 900  
New York, New York 10019